

# CALFRESH (CF) PROGRAM

## REQUEST FOR POLICY/REGULATION INTERPRETATION

**INSTRUCTIONS:** Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO:		5. DATE OF REQUEST:	NEED RESPONSE BY:
<input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input checked="" type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		9/26/16	10/20/16
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION:	
3. PHONE NO.:		Riverside	
4. REGULATION CITE(S):		7. SUBJECT:	
ACL 13-67, All County Information Notice I-25-03		CalFresh	
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references)	
All County Letter 13-67, changed the rules for reporting lost or stolen EBT benefits (cash aid only).		NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

For CalFresh or Food Stamps, is it enough that the claimant made a police report before the benefits were used. The claimant made a report to the County after benefits were used.

Proposed Decision is attached for review.

10. REQUESTOR'S PROPOSED ANSWER:
Please clarify if the law/policy in CalFresh cases has changed.

11. STATE POLICY RESPONSE (CFPB USE ONLY):
CDSS disagrees with the ALJ's interpretation and order. Skimming refers to the stealing of data for the purpose of stealing cash from a person. AB 2035, ACL 13-67 is for cash benefits only. There is no reimbursement for CalFresh/SNAP benefits through AB 2035. What was stolen was data which was used for food benefits. This is more of a case of identity theft rather than skimming. The following wording is on our PUB 388, which is mailed/handed out with every new and replacement card. Page 3 states:

"If someone takes your card and knows your PIN, they can use your benefits! If benefits are withdrawn by someone else before you call Customer Service, YOUR BENEFITS WILL NOT BE REPLACED. Call Customer Service immediately to cancel your card."

(continued on next page)

### FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
September 26, 2016	November 2, 2016 (WEB)

**CALFRESH (CF) PROGRAM**  
**REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

<b>1. RESPONSE NEEDED DUE TO:</b> <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input checked="" type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	<b>5. DATE OF REQUEST:</b>	<b>NEED RESPONSE BY:</b>
	<b>6. COUNTY/ORGANIZATION:</b>	
	<b>7. SUBJECT:</b>	
<b>2. REQUESTOR NAME:</b>	<b>8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references)</b> <b>NOTE: All requests must have a regulation cite(s) and/or a reference(s).</b>	
<b>3. PHONE NO.:</b>		
<b>4. REGULATION CITE(S):</b>		

(continued from "STATE POLICY RESPONSE (CFPB USE ONLY):" on previous page)

The EBT MPP 16-601.6 "Cardholder training" states, "At a minimum, cardholder training shall include the following areas," (y)  
"Exposure to loss of benefits before reporting loss or theft of card."